



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET, N.E.  
ATLANTA, GEORGIA 30365

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MEMORANDUM

DATE: March 6, 1991

SUBJECT: Review of Technical Memo on Hazardous Substance Indicator  
Parameters for Olin Site, McIntosh, AL

FROM: Elmer W. Akin *EWA*  
Health Assessment Officer

TO: Cheryl Smith, RPM  
SSRB

This is a well written and reasonably comprehensive document for identifying the contaminants of potential concern. However, I have a few specific concerns as listed below that should be transmitted verbatim to the PRP. From my viewpoint, they need not submit a revised technical memorandum but may incorporate appropriate changes in the draft baseline risk assessment document.

1. Section 5.1 provides a "half-truth" and misstates the RAGS guidance relative to chemical of concern reductions. It does not "recommend" any reduction but discusses a situation where the contaminants that represent 99% of the risk would be dealt with in the report text & the remainder in an appendix. With this clarification, EPA is in general agreement with the process and selection of the contaminants of potential concern with the following exceptions:
  - ° please clarify what specific "professional judgement" modified the functional-guideline base selection decision (pg. 13).
  - ° the 8 contaminants eliminated on the bases of occurring at levels below CRQL (pg 14) should be reevaluated for any "hits" occurring above relevant MCLs or proposed MCLs. (Many of the CRQLs for VOCs are above the ARAR level). In addition, any carcinogens that occur at maximum concentrations that result in a calculated dose greater than than  $10^{-6}$  risk level should be selected as a contaminant of potential concern.
2. It is assumed that the list of chemical of potential concern is meant to be inclusive for OU#1 and OU#2. It so, it is not apparent that ecological benchmarks were considered in selecting the CPCs for OU#2.

3. Please do not refer to the contaminants as "parameters" (pg. 6). This terminology adds confusion.
4. Table 1 needs correction to remedy a "D" notation in the body, not in the footnotes and an "E" notation in the footnotes, not in the body.
5. In reference to discussion on pg. 14, please note that all groundwater data used in exposure point concentration for the risk assessment must be from unfiltered samples with reasonable sample detection limits for each chemical of interest. (It is unclear what "normalizing the data" entailed).
6. EPA agrees with the statement inferred on pg. 16 that all contaminants detected in the media samples including TICs will be addressed in some way in the baseline risk assessment document.